

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

**v.**

**JESUS MARIA SERRANO-HERRERA,**

**a/k/a "Abimail Muller Colon,"**

**a/k/a "Domi,"**

**MIGUEL GARCIA,**

**a/k/a "Tio,"**

**PEDRO ARIAS,**

**a/k/a "Picu,"**

**a/k/a "Cristian,"**

**a/k/a "Pedro Arias-Almanzar,"**

**MODESTO DOMINGUEZ,**

**a/k/a "El Negro,"**

**RAUL HERRERA**

**RONALD DRUMMOND,**

**a/k/a "Ronald Summers,"**

**a/k/a "Sammy,"**

**SIDIQ SHAHEE MONTGOMERY**

**ALEXIS RODRIGUEZ,**

**a/k/a "Alex,"**

**a/k/a "Titere,"**

**TAMIKA ROBERTS**

**CRIMINAL NO. 13-**

**DATE FILED:**

**VIOLATIONS:**

**21 U.S.C. § 846 (conspiracy to distribute  
1 kilogram or more of heroin - 1 count)**

**21 U.S.C. § 841(a)(1) (distribution of  
100 grams or more of heroin - 2 counts)**

**21 U.S.C. § 841 (a)(1) (possession with  
the intent to distribute 100 grams or  
more of heroin - 3 counts)**

**21 U.S.C. § 841 (a)(1) (possession with  
the intent to distribute heroin- 1 count)**

**18 U.S.C. § 924 (c) (possession of a  
firearm in furtherance of drug  
trafficking -1 count)**

**18 U.S.C. § 922 (g) (felon in possession  
of a firearm - 1 count)**

**18 U.S.C. § 2 (aiding and abetting)**

**Notices of Forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about January 1, 2012, through on or about September 6, 2012, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**JESUS MARIA SERRANO-HERRERA,  
a/k/a "Abimail Muller Colon,"  
a/k/a "Domi,"  
MIGUEL GARCIA,  
a/k/a "Tio,"  
PEDRO ARIAS,  
a/k/a "Picu,"  
a/k/a "Cristian,"  
a/k/a "Pedro Arias-Almanzar,"  
MODESTO DOMINGUEZ,  
a/k/a "El Negro,"  
RAUL HERRERA,  
RONALD DRUMMOND,  
a/k/a "Ronald Summers,"  
a/k/a "Sammy,"  
SIDIQ SHAHEE MONTGOMERY,  
ALEXIS RODRIGUEZ,  
a/k/a "Alex,"  
a/k/a "Titere," and  
TAMIKA ROBERTS**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant JESUS MARIA SERRANO-HERRERA was the head of the

SERRANO drug trafficking organization (“SERRANO DTO”) which distributed resale quantities of bulk and pre-packaged branded heroin to individuals known and unknown to the grand jury, including defendants RONALD DRUMMOND, SIDIQ SHAHEE MONTGOMERY, ALEXIS RODRIGUEZ, and TAMIKA ROBERTS.

3. Defendant MIGUEL GARCIA acted as the SERRANO DTO’s primary salesman and arranged deals with the English-speaking customers of the SERRANO DTO such as defendants RONALD DRUMMOND and SIDIQ SHAHEE MONTGOMERY. Since defendant JESUS MARIA SERRANO-HERRERA did not speak English well, defendant GARCIA often acted as a translator between defendant JESUS MARIA SERRANO-HERRERA and his English-speaking customers.

4. The SERRANO DTO employed a team of workers to package and stamp the heroin packages with unique markings. This team of workers was headed by defendants PEDRO ARIAS and RAUL HERRERA. Defendant JESUS MARIA SERRANO-HERRERA gave ARIAS precise instructions on how much heroin to package and what markings to stamp on the packages.

5. The SERRANO DTO stamped the heroin packages with unique brands pursuant at the request of each customer. Defendants JESUS MARIA SERRANO-HERRERA and ALEXIS RODRIGUEZ purchased the necessary stamps to brand the heroin packages.

6. Defendant MODESTO DOMINGUEZ acted as the courier for the SERRANO DTO. Defendant DOMINGUEZ picked up the heroin from defendant PEDRO ARIAS and the other packagers and delivered it to the SERRANO DTO’s distributors such as defendants RONALD DRUMMOND and SIDIQ SHAHEE MONTGOMERY.

7. Defendants JESUS MARIA SERRANO-HERRERA, MIGUEL GARCIA, PEDRO ARIAS, MODESTO DOMINGUEZ, RAUL HERRERA, RONALD DRUMMOND, SIDIQ SHAHEE MONTGOMERY, ALEXIS RODRIGUEZ, TAMIKA ROBERTS, and others known and unknown to the grand jury, regularly used their cellular telephones to communicate, in coded language, with one another to coordinate, arrange, and carry out the drug trafficking organizations' daily operations, including the conduct of the heroin packaging operation, the delivery of bundled, branded heroin, the quality and quantity of the heroin, the collection and safeguarding of proceeds, and the monitoring of law enforcement activity in the areas where the organization operated.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 6, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JESUS MARIA SERRANO-HERRERA,  
a/k/a "Abimail Muller Colon,"  
a/k/a "Domi,"  
PEDRO ARIAS,  
a/k/a "Picu,"  
a/k/a "Cristian,"  
a/k/a "Pedro Arias-Almanzar," and  
RAUL HERRERA**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with the intent to distribute of, 100 grams or more, that is, approximately 501 grams, of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(B) and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 6, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD DRUMMOND,  
a/k/a "Ronald Summers,"  
a/k/a "Sammy,"**

knowingly and intentionally possessed with the intent to distribute 100 grams or more, that is, approximately 235 grams, of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(B).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 6, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD DRUMMOND,  
a/k/a "Ronald Summers,"  
a/k/a "Sammy,"**

knowingly possessed a firearm, that is: (1) a Sig Sauer semi-automatic pistol, model number P226, with an obliterated serial number, loaded with one live round in the chamber, and (2) a Smith and Wesson semi-automatic pistol, model number Springfield SW40VE, serial number DVV9937, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance, in violation of Title 21, United States Code, Section 846, and possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 6, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RONALD DRUMMOND,  
a/k/a "Ronald Summers,"  
a/k/a "Sammy,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, (1) a Sig Sauer semi-automatic pistol, model number P226, with an obliterated serial number, loaded with one live round in the chamber, and (2) a Smith and Wesson semi-automatic pistol, model number Springfield SW40VE, serial number DVV9937.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 6, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TAMIKA ROBERTS**

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(C).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 31, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JESUS MARIA SERRANO-HERRERA,  
a/k/a "Abimail Muller Colon,"  
a/k/a "Domi,"  
MIGUEL GARCIA,  
a/k/a "Tio,"  
PEDRO ARIAS,  
a/k/a "Picu,"  
a/k/a "Cristian,"  
a/k/a "Pedro Arias-Almanzar," and  
MODESTO DOMINGUEZ,  
a/k/a "El Negro,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(B) and Title 18, United States Code, Section 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 31, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SIDIQ SHAHEE MONTGOMERY**

knowingly and intentionally possessed with the intent to distribute 100 grams or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(B).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 13, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JESUS MARIA SERRANO-HERRERA,  
a/k/a "Abimail Muller Colon,"  
a/k/a "Domi," and  
MIGUEL GARCIA,  
a/k/a "Tio,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1),(b)(1)(B) and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT :**

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1) as set forth in this indictment, defendants

**JESUS MARIA SERRANO-HERRERA,  
a/k/a "Abimail Muller Colon,"  
a/k/a "Domi,"  
MIGUEL GARCIA,  
a/k/a "Tio,"  
PEDRO ARIAS,  
a/k/a "Picu,"  
a/k/a "Cristian,"  
a/k/a "Pedro Arias-Almanzar,"  
MODESTO DOMINGUEZ,  
a/k/a "El Negro,"  
RAUL HERRERA,  
RONALD DRUMMOND,  
a/k/a "Ronald Summers,"  
a/k/a "Sammy,"  
SIDIQ SHAHEE MONTGOMERY,  
ALEXIS RODRIGUEZ,  
a/k/a "Alex,"  
a/k/a "Titere," and  
TAMIKA ROBERTS**

shall forfeit to the United States of America:

- (a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense;
- (b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT :**

1. As a result of the violations of Title 18, United States Code, Sections 922(g) and 924(c), set forth in this indictment, defendant

**RONALD DRUMMOND,  
a/k/a "Ronald Summers,"  
a/k/a "Sammy,"**

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (a) a Sig Sauer semi-automatic pistol, model number P226, with an obliterated serial number, loaded with one live round in the chamber, and
- (b) a Smith and Wesson semi-automatic pistol, model number Springfield SW40VE, serial number DVV9937.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER**  
**United States Attorney**